

FILED 9 DEC '24 10:33USDC-ORP

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Multnomah County DIVISION

Isaac Cortez Bynum Jr.

(Enter full name of plaintiff)

Plaintiff,

v.

Civil Case No. 3:24-cv-02046-AR
(to be assigned by Clerk's Office)

COMPLAINT FOR VIOLATION OF CIVIL
RIGHTS (PRISONER COMPLAINT)

Nicole Morrissey O'Donnell

Jury Trial Demanded

☒ Yes

☐ No

(Multnomah County Detention Center)

(Enter full name of ALL defendant(s))

Defendant(s).

I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

Plaintiff

Name: Isaac Bynum #778403

Street Address: 11540 NE Inverness Drive

City, State & Zip Code: Portland, Oregon 97220

Telephone No.: N/A

Defendant No. 1

Name: Nicole Morrissey O'Donnell
Street Address: 11540 NE Inverness Drive
City, State & Zip Code: Portland, Oregon 97220
Telephone No.: N/A

Defendant No. 2

Name: _____
Street Address: _____
City, State & Zip Code: _____
Telephone No.: _____

Defendant No. 3

Name: _____
Street Address: _____
City, State & Zip Code: _____
Telephone No.: _____

Defendant No. 4

Name: _____
Street Address: _____
City, State & Zip Code: _____
Telephone No.: _____

II. BASIS FOR JURISDICTION

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. You are bringing suit against (*check all that apply*):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. What federal constitutional, statutory, or treaty right(s) is/are at issue?

First Amendment and Fourteenth Amendment

III. STATEMENT OF CLAIMS

Claim I

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

Since being in Multnomah County Detention Center, I have
been prohibited from performing religious services, engaging
in daily congregational prayers, wearing religious headwear or other
clothing items, accessing a kosher meal. Also I have been
unable to engage in Jumu'ah prayer services, there
is no faith class using the Quran as the central text.
M.C.D.C. authorizes Christian faith classes while
not allowing or offering Islamic Faith classes. I
have been in M.C.D.C. for 25 months.

Claim II

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

N/A

N/A

Claim III

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

N/A

(If you have additional claims, describe them on another piece of paper, using the same outline.)

IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES

I have filed for administrative relief as to all claims in Section III and have concluded all administrative appeals available to me.

☒ Yes

☐ No

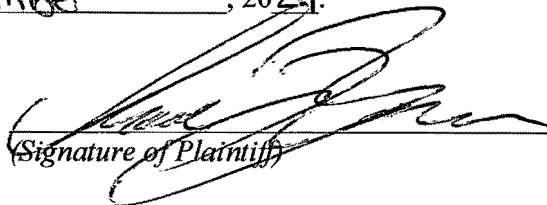
V. RELIEF

State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.

I am seeking \$225,000 in monetary
Compensation.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 24th day of November, 2024.


(Signature of Plaintiff)

11540 NE Inverness Drive
Portland, Oregon 97228
2.04

FIRST-CLASS



US POSTAGE PITNEY BOWES

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United States District Court

Melissa Aubin

Clerk of Court

Office Of the Clerk

District of Oregon

740 United States Courthouse

1000 S.W. Third Avenue

Portland, Oregon 97204-2902